



201-15555

Product Safety and Regulatory Affairs

May 12, 2004

Mike Leavitt, Administrator
U.S. Environmental Protection Agency
P.O. Box 1473
Merrifield, VA 22116

Re: HPV Chemical Challenge Program, Amendment of Commitment on CAS Nos. 334485, 61788667, 61789091, 61790383, 67701024, 67701320, 67762361 and 68424373

Dear Mr. Leavitt:

Crompton Corporation on 22 December 1999 informed you that it was sponsoring CAS Nos. 334485, 61788667, 61789091, 61790383, 67701024, 67701320, 67762361 and 68424373 under the HPV Chemical Challenge Program as follows:

CAS Number	Chemical Name	Start Year Date	Consortia/Panel
334485	Decanoic acid	2002	Soap and Detergent Association (SDA) Aliphatic Acid
61788667	Fatty acids, vegetable oil	2002	SDA-Aliphatic Acid
61789091	Glycerides, tallow mono-,hydrogenated	2002	SDA-Glycerides
61790383	Fatty acids, tallow, hydrogenated	2002	SDA-Aliphatic Acid
67701024	Fatty acid, C14-C18	2002	SDA-Aliphatic Acid
67701320	Glycerides, C14-18 and C16-18 unsatd. Mon- and di-	2002	SDA-Glycerides
67762361	Fatty acids, C6-12	2002	SDA-Aliphatic Acid
68424373	Fatty acids C14-22	2002	SDA-Aliphatic Acid



Through this letter, we are informing you that Crompton Corporation will no longer sponsor CAS Nos. 334485, 61788667, 61789091, 61790383, 67701024, 67701320, 67762361 and 68424373 under the EPA HPV Challenge Program. We are amending our commitment for the following reasons:

CAS Number	Chemical Name	Reason for Amending Commitment
334485	Decanoic acid	Erroneous commitment: This number was incorrectly used. The correct number should be 68937757 (fatty acid C8-10), which is sponsored under the ICCA HPV program by the SDA/APAG Aliphatic Acids Consortium
61788667	Fatty acids, vegetable oil	Erroneous commitment: This number was incorrectly used. The correct numbers should be 61790372 (fatty acids, tallow), which is sponsored under the ICCA HPV program by the APAG Fatty Acids Group and 67714080 which is not a 1990 HPV chemical
61789091	Glycerides, tallow mono-,hydrogenated	Erroneous commitment: This number was incorrectly used. The correct number should be 31566311 (octadecanoic acid, monoester with 1,2,3-propanetriol), which is sponsored under the ICCA HPV program by the SDA/Glyceride Consortium
61790383	Fatty acids, tallow, hydrogenated	Erroneous commitment: This number was incorrectly used. The correct numbers should be 57103 (hexadecanoic acid) and 57114 (octadecanoic acid) which are both sponsored under the ICCA HPV program by the SDA/APAG Aliphatic Acids Consortium
67701024	Fatty acid, C14-C18	Erroneous commitment: This number was incorrectly used. The correct numbers should be 57103 (hexadecanoic acid), 57114 (octadecanoic acid) and 544638 (tetradecanoic acid) which are all sponsored under the ICCA HPV program by the SDA/APAG Aliphatic Acids Consortium
67701320	Glycerides, C14-18 and C16-18 unsatd. Mon- and di-	Erroneous commitment: Crompton no longer manufactures or imports this material
67762361	Fatty acids, C6-12	Erroneous commitment: Crompton does not manufacture or import this material

68424373	Fatty acids C14-22	Erroneous commitment: This number was incorrectly used. The correct numbers should be 57114 (octadecanoic acid), sponsored under the ICCA HPV program by the SDA/APAG Aliphatic Acids Consortium; 112856 (docosanoic acid) SIDS and sponsored under the ICCA HPV program by NOF Corporation, and 506309 which is not a 1990 HPV chemical
----------	--------------------	--

Crompton's commitment for the remaining CAS Nos. listed in our 22 December 1999 letter to you remains intact.

Should you have any questions please do not hesitate to contact me directly at (203) 573-2219. My fax number is (203) 573-4531.

Sincerely yours,

Alan Taylor, Ph.D.
Director, Product Safety and Regulatory Affairs
Crompton Corporation

cc: Barbara Leczynski, USEPA
Jim Keith, ACC Product Stewardship Team
HPV program, Soap and Detergent Association